<u>REMARKS</u>

The present application has been reviewed in light of the Office Action dated October 6, 2008. Claims 1-6, 8, and 10 are presented for examination, of which Claims 1, 3, and 5 are in independent form. Claims 7 and 9 have been cancelled without prejudice or disclaimer to the subject matter recited therein. Claims 1-6, 8, and 10 have been amended to define aspects of Applicant's invention more clearly. Support for the claim amendments may be found in the specification, for example, at page 25, line 13, through page 27, line 9. Favorable reconsideration of the present application is requested.

The Office Action states that Claims 1-10 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,987,494 (*Ouchi*) in view of U.S. Patent Application Publication No. 2003/0142683 (*Lam et al.*) and in further view of a document entitled "Request for Comments No. 2462: IPv6 Stateless Address Autoconfiguration" (*Thomson et al.*). Cancellation of Claims 7 and 9 renders their rejections moot. For at least the following reasons, Applicant submits that independent Claims 1, 3, and 5, together with the claims dependent therefrom, are patentably distinct from the cited prior art.

The aspect of the present invention set forth in Claim 1 is directed to a composite image for processing apparatus image processing apparatus that performs image processing functions, including a printer function and a scanner function. The apparatus includes (1) an IP address generator, connected to an IPv6 router on a network, operable to acquire prefix information from the IPv6 router and generate an IP address unique to each of the plurality of image processing functions based on the acquired prefix information, and (2) a controller operable to communicate with a plurality of appliances on the network by use of the IP addresses generated for the plurality of image processing functions and

operate each of the plurality of image processing functions via a common to execute communications between each of the plurality of image processing functions and at least one of the plurality of appliances, and to execute a transfer task for transferring packet data. The transfer task for transferring packet data is executed on a time-division basis using buffer areas allocated to the printer function and the scanner function, respectively.

Notable features of Claim 1 are that the IP address generator acquires prefix information from the IPv6 router and generates an IP address unique to each of the plurality of image processing functions based on the acquired prefix information, and that the transfer task for transferring packet data is executed on a time-division basis using buffer areas allocated to the printer function and the scanner function, respectively. By virtue of these features, separate printer and scanner drivers can be installed on a computer to which the apparatus is connected, which enables the computer to access concurrently the printer function and the scanner function, for example.[1]

Ouchi relates to a multi-function device capable of concurrently processing a plurality of control programs using time sharing methods. As best understood by Applicant, the multi-function device does not generate a unique IP address for each of a plurality of image processing functions based on acquired prefix information. Moreover, the multi-function device does not transfer packet data on a time-division basis using buffer areas allocated to a printer function and a scanner function, respectively.

Lam et al. relates to methods and apparatuses for providing multi-user access

---

[1] The example(s) presented herein are intended for illustrative purposes only. Any details presented in the illustrative example(s) should not be construed to limit the scope of the claims.

to devices and the Internet. Apparently, *Lam et al.* teaches a peripheral access router 38 that communicates with peripheral devices, including a camera 44, a digital video disk (DVD) player 46, a compact disk read/writer (CD-R/W) 48, a storage hard drive 50, a scanner 52, a printer 54, a copier 56, and a telephone 58, each of which has a unique IP address (*see* paragraphs 35, 36 and FIG. 2). As best understood by Applicant, none of the peripheral devices has a plurality of IP addresses, each of which is assigned to a different image processing function. Nothing has been found in *Lam et al.* that is believed to teach or suggest that the peripheral access router 38 generates a unique IP address for each of a plurality of image processing functions based on acquired prefix information, and transfers packet data on a time-division basis using buffer areas allocated to a printer function and a scanner function, respectively.

Thomson et al. relates to autoconfiguration of IPv6 addresses. Nothing has been found in *Thomson et al.* that is believed to cure the above-identified deficiencies of *Ouchi* and *Lam et al.*

Applicant submits that *Ouchi*, *Lam et al.*, and *Thomson et al.*, whether considered individually or in combination, assuming such combination would even be permissible, would fail to teach or suggest a composite image processing apparatus that includes "an IP address generator, connected to an IPv6 router on a network, operable to acquire prefix information from the IPv6 router and generate an IP address unique to each of the plurality of image processing functions based on the acquired prefix information" and that "the transfer task for transferring packet data is executed on a time-division basis using buffer areas allocated to the printer function and the scanner function, respectively," as claimed in Claim 1. Accordingly, Applicant submits that Claim 1 is patentable over *Ouchi*,

Lam et al., and *Thomson et al.*

Independent Claims 3 and 5 include features similar to those of Claim 1 and are believed to be patentable for at least the reasons discussed above. The other claims in the present application depend from one or another of Claims 1, 3, and 5 and therefore are submitted to be patentable for at least the same reasons. However, because each dependent claim also is deemed to define an additional aspect of the invention, individual consideration of the patentability of each claim on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicant respectfully requests favorable reconsideration and an early passage to issue of the present application.

Applicant's undersigned attorney may be reached in our New York Office by telephone at (212) 218-2100. All correspondence should continue to be directed to our address listed below.

Respectfully submitted,

/Jonathan Berschadsky/
Jonathan Berschadsky
Attorney for Applicant
Registration No. 46,551

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3801
Facsimile: (212) 218-2200

FCHS_WS 2600098v1